

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Carmen Electra et al.,	)	Case No. 5:18-cv-02706-SL
	)	
Plaintiffs,	)	Judge Sara Lioi
	)	
vs.	)	
	)	
Dreamers Cabaret, LLC et al.,	)	
	)	
Defendants.	)	

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**JOINT MOTION TO MODIFY SCHEDULING ORDER**

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For good cause, the Parties respectfully request that the Court modify the Scheduling Order. As set forth below, the Parties seek a three-month extension of all pending deadlines.

Due to the ongoing COVID-19 pandemic, the Parties' ability to proceed with case preparation and discovery is significantly hampered. While the Parties intend to take advantage of technology to allow discovery to proceed and to otherwise advance the case while observing social distancing requirements, the disruptions caused by various "shelter-in-place" or "stay-at-home" executive orders in which witnesses and attorneys are located impede the Parties' abilities to proceed within the deadlines set under the present schedule. In addition, the Parties are engaged in settlement discussions that they hope will be fruitful. The Parties believe that the requested modifications to the Scheduling Order will allow the Parties to continue these discussions and, if unsuccessful, conduct the discovery necessary to prepare for trial.

Accordingly, the Parties respectfully request a modification to the Scheduling Order that extends all deadlines by approximately three-months as follows:

<b>CASE EVENT</b>	<b>DATE</b>
<b>Deadline for completing non-expert discovery:</b>	<b>August 17, 2020</b>
<b>Deadline for party with burden of proof to identify experts and provide reports:</b>	<b>September 28, 2020</b>
<b>Deadline to identify rebuttal experts and provide reports:</b>	<b>November 1, 2020</b>
<b>Deadline for completing expert discovery:</b>	<b>December 4, 2020</b>
<b>Deadline for filing dispositive motions:</b>	<b>January 8, 2021</b>
<b>Deadline for filing oppositions to motions:</b>	<b>February 5, 2021</b>
<b>Deadline for filing replies to responses:</b>	<b>February 19, 2021</b>
<b>Status Conference:</b>	<b>September 21, 2020 at 2:00pm (Telephonic)</b>
<b>Final Pretrial Conference:</b>	<b>April 26, 2021 at 2:00pm</b>
<b>Jury Trial set on two week standby period beginning:</b>	<b>May 17, 2021 at 8:00am.</b>

For good cause, the Parties respectfully request that the Court grant their Joint Motion to Modify the Scheduling Order.

Dated: April 16, 2020

Respectfully submitted,

/s/ David Harman

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**PROPOSED SCHEDULING ORDER**

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The Court, having received and reviewed the Parties' Joint Motion to Modify the Scheduling Order, adopts the Parties' suggested dates and Orders that this case shall proceed as follows:

<b>CASE EVENT</b>	<b>DATE</b>
<b>Deadline for completing non-expert discovery:</b>	<b>August 17, 2020</b>
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**IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE